

Citizen Participation Plan

2019 CDBG-DR

VERSION 7



Oklahoma Department of Commerce

Effective Date: August 10, 2022

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Introduction

Audience for this Citizen Participation Plan

The Oklahoma Department of Commerce Community Development division (ODOC/CD) has developed a Citizen Participation Plan (CPP) for the 2019 Community Development Block Grant Disaster Recovery (CDBG-DR) program in compliance with the requirements set forth 24 CFR §91.110 (Consultation; States) and 24 CFR Part §91.115 (Citizen Participation Plan for States). This CPP provides citizens an opportunity to participate in an advisory role in the planning, implementation, and evaluation of the State's disaster recovery program.

This document also describes Citizen Participation requirements for eligible applicants and current Subgrantees (see Section 4) who are interested in administering eligible activities under the 2019 CDBG-DR Action Plan.

Accessibility Statement

The Oklahoma Department of Commerce is committed to making its electronic and information technologies accessible to individuals with disabilities in accordance with both Section 508 of the Rehabilitation Act (29 U.S.C. 794d), as well as Oklahoma's Oklahoma Electronic and Information Technology Accessibility law, or EITA.

Oklahoma works to make its government more transparent, available, and useful. Making State technology resources accessible to people with disabilities helps the State to meet its goal of creating a more transparent government. Complete information can be found at <https://www.ok.gov/accessibility/>.

Commerce posts many documents to our websites in Adobe PDF format to provide enhanced document features and preserve design. The ability to open PDF documents is built into most popular web browsers and Adobe Reader is provided for free by Adobe at adobe.com. Commerce posts PDFs in text format so that documents can be read by screen readers.

Commerce posts some documents to our websites in Microsoft Office formats including Word, Excel, and PowerPoint format. Microsoft provides viewer applications for these formats for free on their website at microsoft.com.

Disaster Recovery Website

ODOC/CD maintains a website specifically for the 2019 CDBG-DR program. Please visit: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/> and check back often because the website is frequently updated.

- Notifications for Public Hearings and Notice for Public Comments will be published in English and Spanish.
- Read the 2019 CDBG-DR Action Plan, Citizen Participation Plan, Quarterly Reporting, and more.
- The 2019 CDBG-DR website is available in multiple languages by clicking the “Translate This Page” button located at the top of the screen.

If you need assistance with the website, or encounter any technical difficulties with the website, please contact hello@okcommerce.gov.

Applicable Version

The Applicable Version of the 2019 CDBG-DR CPP is always the version currently published on the website. ODOC/CD reserves the right to modify the CPP as it deems necessary to ensure that HUD Requirements and ODOC policies are met. If ODOC/CD updates the CPP it will be published on our website. Please refer to the Change History at the end of this document to see the changes that have been made. Changes to the Citizen Participation Plan do not require a Notice of Public Hearing or Notice of Public Comment.

Staff Contacts

Please contact Jade Shain if you have any questions, comments, or if in need of assistance for disability accommodations, translation, or interpretation services.

Jade Shain | Programs Planner
Community Development (CDBG-DR)
Oklahoma Department of Commerce
jade.shain@okcommerce.gov



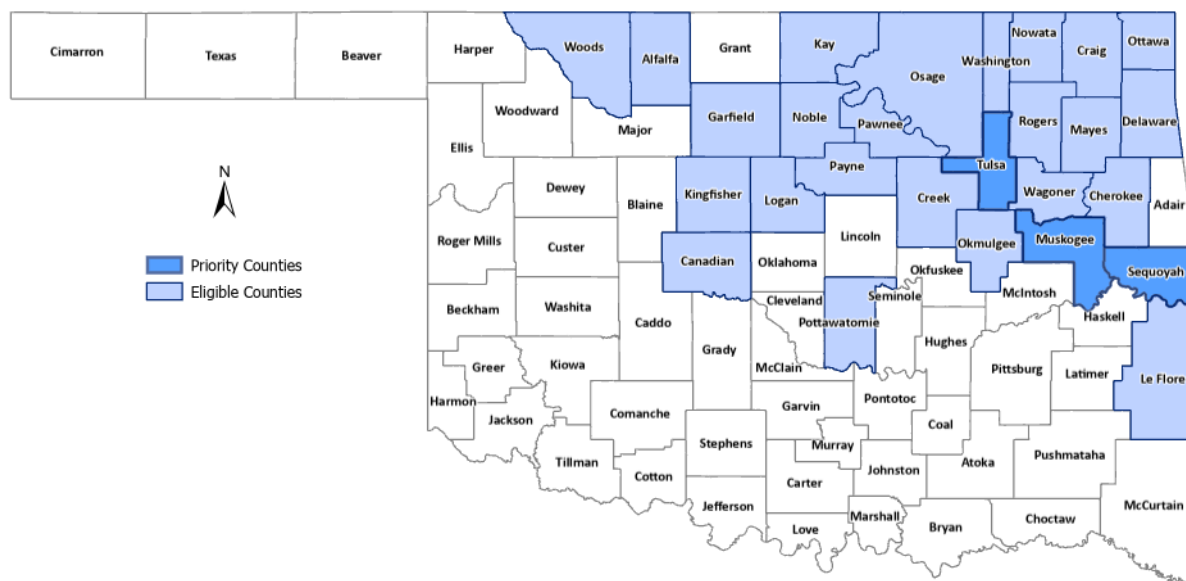
Rebecca LaVictoire | Programs Manager
Community Development
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Background to the 2019 CDBG-DR Grant Program

Oklahoma experienced severe storms from May 7, 2019, through June 9, 2019. These storms brought straight-line winds, tornadoes, and significant flooding to several communities throughout the state.

Due to the extensive damage to housing and infrastructure from these storms, an allocation notice was issued by the United States Department of Housing and Urban Development (HUD) in Federal Register Notice Vol. 78, No. 43, Page 14329 Public Law 116-20. This Federal Register Notice states that Oklahoma is eligible to receive an allocation of \$36,353,000 in disaster recovery funds for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et. Seq.) to address long-term recovery needs, particularly in the area of housing recovery that focuses on low and moderate-income beneficiaries. Per the Federal Register Notice, the only areas in which the funding can be expended lie in Presidentially Declared Disaster areas of the state occurring during the incident period (May 7, 2019 to June 9, 2019) as defined under the applicable Disaster Declaration 4438. Within these eligible areas, the Federal Register Notice requires that a minimum of \$29,082,000, or 80% of the total State's \$36,353,000 CDBG-DR funding allocation, must be expended on CDBG eligible disaster related activities in Muskogee, Tulsa, and Sequoyah counties (see map below).



The remaining funding will be available for CDBG eligible disaster related activities in eligible counties as defined by Disaster Declaration 4438. Applicants from Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield,

Kay, Kingfisher, Le Flore, Logan, Mayes, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Wagoner, Washington, and Woods are also eligible to submit applications related to the aforementioned disaster.

Translation and Interpretation for Limited English Proficiency

All Oklahomans are provided an opportunity to understand and participate in the 2019 CDBG-DR program CPP. ODOC/CD is prepared to aid those citizens who have Limited English Proficiency (LEP) upon request.

The State is committed to providing all citizens with meaningful access to information about the recovery program, including persons with disabilities and limited English proficiency (LEP). The State follows HUD regulation, 24 CFR Part 1, "Nondiscrimination in Federally Assisted Programs of the Department of Housing and Urban Development—Effectuation of Title VI of the Civil Rights Act of 1964," which requires all recipients of federal financial assistance from HUD to provide meaningful access to LEP persons. Additionally, per 24 CFR §91.115(b)(3)(iii), in order to comply with Title VI of Civil Rights Act of 1964 and avoid discrimination on the grounds of race, color, or national origin, all HUD funded programs (CDBG, ESG, HOME, HOPWA, HTF) and associated activities administered by the Oklahoma Department of Commerce / Community Development (ODOC/CD) will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in benefits and services for which such persons qualify. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination.

For assistance with translation and interpretation services and requests, please contact Jade Shain.

Jade Shain | Programs Planner
Community Development (CDBG-DR)
Oklahoma Department of Commerce
jade.shain@okcommerce.gov



People with Disabilities

All Oklahomans are provided an opportunity to understand and participate in the 2019 CDBG-DR program under an advisory role. ODOC/CD is prepared to aid those citizens that have disabilities upon request. ODOC will offer sign language interpretation upon request, closed captioning for virtual Zoom meetings, and accessible documents. Further, ODOC will provide for a professional service to translate graphs and charts so that the visually impaired have adequate access to written elements of the CDBG-DR program.

For assistance for people with disabilities or to make specific requests, please contact Jade Shain (jade.shain@okcommerce.gov).

Timeline of Citizen Participation

This section of the CPP details the citizen participation efforts at the time of publication of the CPP and State's CDBG-DR Action Plan:

February 21, 2020: Emails were sent by ODOC/CD to Substate Planning Districts and eligible counties within the qualifying disaster zone requesting CDBG-DR disaster related information.

June 29, 2020: The CDBG-DR Public Hearing Notice was sent to ODOC Marketing for webpage and public media dissemination.

July 10, 2020: The Draft CDBG-DR Action Plan was posted to the CDBG-DR webpage for public review. The Public Hearing notice was also listed in the monthly ODOC *New Pioneer* Newsletter. ODOC's outreach was extended through Facebook and Twitter as well. The announcement also contained contact information for interested individuals who desired more direct discussion via telephone or contact via email.

July 23, 2020: A formal Public Hearing was held via Zoom at 1:00 PM Central Standard Time.

July 23, 2020: Public comment period starts for CDBG-DR Action Plan. By regulation, a minimum of thirty (30) days is required to allow for public review of the proposed Action Plan.

August 24, 2020: Comment period ends for draft CDBG-DR Action Plan.

August 27, 2020: CDBG-DR Action Plan due for submission to HUD.

October 8, 2020: HUD returned review comments on draft 1 of the CDBG-DR Action Plan

October 8, 2020 – November 20, 2020: ODOC reached out to counties, cities, tribal nations, Public Housing Authorities, non-profit organizations, and state agencies for additional data¹.

February 08, 2021: ODOC received FEMA-IA data to analyze for the Action Plan.

March 31, 2021: ODOC met with residents of Moffett, Oklahoma, to discuss the CDBG-DR grant program.

October 27, 2021: Virtual Townhall meeting for citizens to provide feedback on the CDBG-DR Housing Rehabilitation Program.

April 1, 2022: Public comment period begins for Substantial Amendment # 2 to the 2019 CDBG-DR Action Plan. Request for Public Comment posted on the State's 2019 CDBG-DR website (English and Spanish), The Oklahoman newspaper (English and Spanish), and La Semana del Sur (Spanish).

May 10, 2022: Public comment period ends for Substantial Amendment # 2 to the 2019 CDBG-DR Action Plan.

Substantial Amendments

According to the State's 2019 CDBG-DR Action Plan, a substantial amendment is defined as:

1. A change in program benefit or eligibility criteria.
2. The addition or deletion of an activity; or
3. The allocation or reallocation of more than \$3.6 million.

Only those amendments that meet the definition of a Substantial Amendment are subject to the public notification and public comment procedures. The State is not required to hold a public hearing for Substantial Changes to the 2019 CDBG-DR Action Plan, to the Citizen Participation Plan, or to the Language Access Plan.

¹ Refer to Appendix for specific entities contacted for these outreach efforts.

Specifically, a public notice will be published online at the ODOC/CD CDBG Disaster Recovery webpage (<https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/>) and comment will be sought when assistance programs are further defined (i.e., change in program benefit or eligibility criteria) or when funding allocations are further refined by type of activity and location, if applicable. Per the Federal Register Notice guidelines, all amendments (Non-Substantial and Substantial) to the Action Plan will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. Additionally, the CDBG Disaster Recovery Action Plan will be revised to reflect the amendments (Non-Substantial and Substantial) to the Action Plan. As with the amendments, the CDBG Disaster Recovery Action Plan is posted online at the ODOC/CD CDBG Disaster Recovery webpage. Hard copies will also be made available upon request. Citizens, units of local government, and community partners will be provided notice and the opportunity to comment on proposed Substantial Amendments to the Action Plan. **No less than thirty (30) days will be provided for review and comment on the Substantial Amendment.** Comments will be accepted electronically or in writing and will be posted online at the ODOC/CD CDBG Disaster Recovery webpage. A summary of all comments received, and responses will be included in the Substantial Amendment that is submitted to HUD for approval. Each amendment submitted to HUD for approval will be numbered sequentially and is meant to supersede the earlier amendments in the published Action Plan.

Substantial Amendments to the State's Action Plan: Requirements for ODOC/CD

Public Hearings are not required for Substantial Amendments to the 2019 CDBG-DR Action Plan. However, the State is required to notify the public that a Substantial Amendment has been proposed and offer the public an opportunity for review of the proposed changes and also to provide comments. All Notification of Public Comment will be published at least fifteen (15) days before the beginning of the thirty (30) day comment window.

Under the Federal Register Notice (Vol. 78, No. 43, Page 14329 Public Law 116-20), "Each grantee must publish the action plan in a manner that affords citizens, affected local governments, and other interested parties a reasonable opportunity to examine the contents and provide feedback." ODOC/CD will adhere to the requirements of 24 CFR 91.115 or 91.105 (except as provided for in notices providing waivers and alternative requirements for this grant).

Request for Public Comment to Substantial Amendments to the State's 2019 CDBG-DR Action Plan

A Request for Public Comment will be posted, at a minimum, to the following three locations:

Location	Languages
2019 CDBG-DR webpage https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019-2/ This website has a wide reach.	English Spanish

The Oklahoman Newspaper https://www.oklahoman.com/ The newspaper of record in Oklahoma.	English Spanish
La Semana del Sur https://lasemanadelsur.com/ This newspaper has a wide reach in the Latino community.	Spanish

Public Comment Procedure for Substantial Amendments

The State will consider any comments or views received in writing or expressed orally. Contact details will always be provided in the Notice for Public Hearing. Upon receiving a comment, the State will provide a timely, substantive written response addressing the comment within a fifteen (15) working day period. Depending on the nature of the comment and depth of the issue, an extended response time may be required by the State in order to obtain the required regulatory guidance or obtain the appropriate level of HUD staff assistance. Should an extended response time be required, the State will notify the individuals or entities making the comment of the following: (1.) The comment has been received by the State; (2.) The comment is of a nature that cannot be reasonably responded to within the fifteen (15) business days; and (3.) Provide an appropriate staff contact name, telephone number, and email address in order that the progress on the response/solution can be monitored or additional inquiries can be made as applicable.

ODOC Citizen Outreach Efforts

Efforts during the Development of the Action Plan

To ensure ODOC/CD sufficiently assessed the recovery needs of all areas affected by the disasters of 2019, ODOC/CD consulted with Tribal Nations, local governments, federal partners, nongovernmental organizations, the private sector, and other stakeholders and affected citizens in the surrounding geographic area to ensure consistency of the Action Plan with applicable regional redevelopment plans. ODOC/CD will continually provide opportunities for partners, local governments, and citizens to provide input into programs and ensure outreach to all minority groups and persons with disabilities.

This section of the CPP explains the outreach conducted by ODOC/CD when developing the initial Action Plan.

TRIBAL NATIONS

ODOC/CD reached out to 37 Tribal Nations via phone, e-mail, and physical mail to determine the following questions:

- 1) Are there any unmet *housing* needs in the Tribal Nation following the disaster?
- 2) Are there any unmet *infrastructure* needs in the Tribal Nation following the disaster?

To date, four Tribal Nations have issued responses indicating that there are NO unmet needs in their communities. For more information, please refer to Appendix A.

COUNCILS OF GOVERNMENT

ODOC/CD reached out to 7 Councils of Government via e-mail to determine the following questions:

- 1) Are there any unmet *housing* needs following the disaster?
- 2) Are there any unmet *infrastructure* needs following the disaster?

To date, zero Councils of Government have issued a response indicating that there are unmet needs in their planning district. For more information, please refer to Appendix A.

UNITS OF LOCAL GOVERNMENT

Most of the counties under DR-4438 are considered rural with small towns. ODOC/CD has relied on direct contact with larger entities (e.g., Counties, Oklahoma Emergency Management, Tribal Nations, Public Housing Authorities, and Catholic Charities) that have connections to the smaller communities within the State.

PUBLIC HOUSING AUTHORITIES

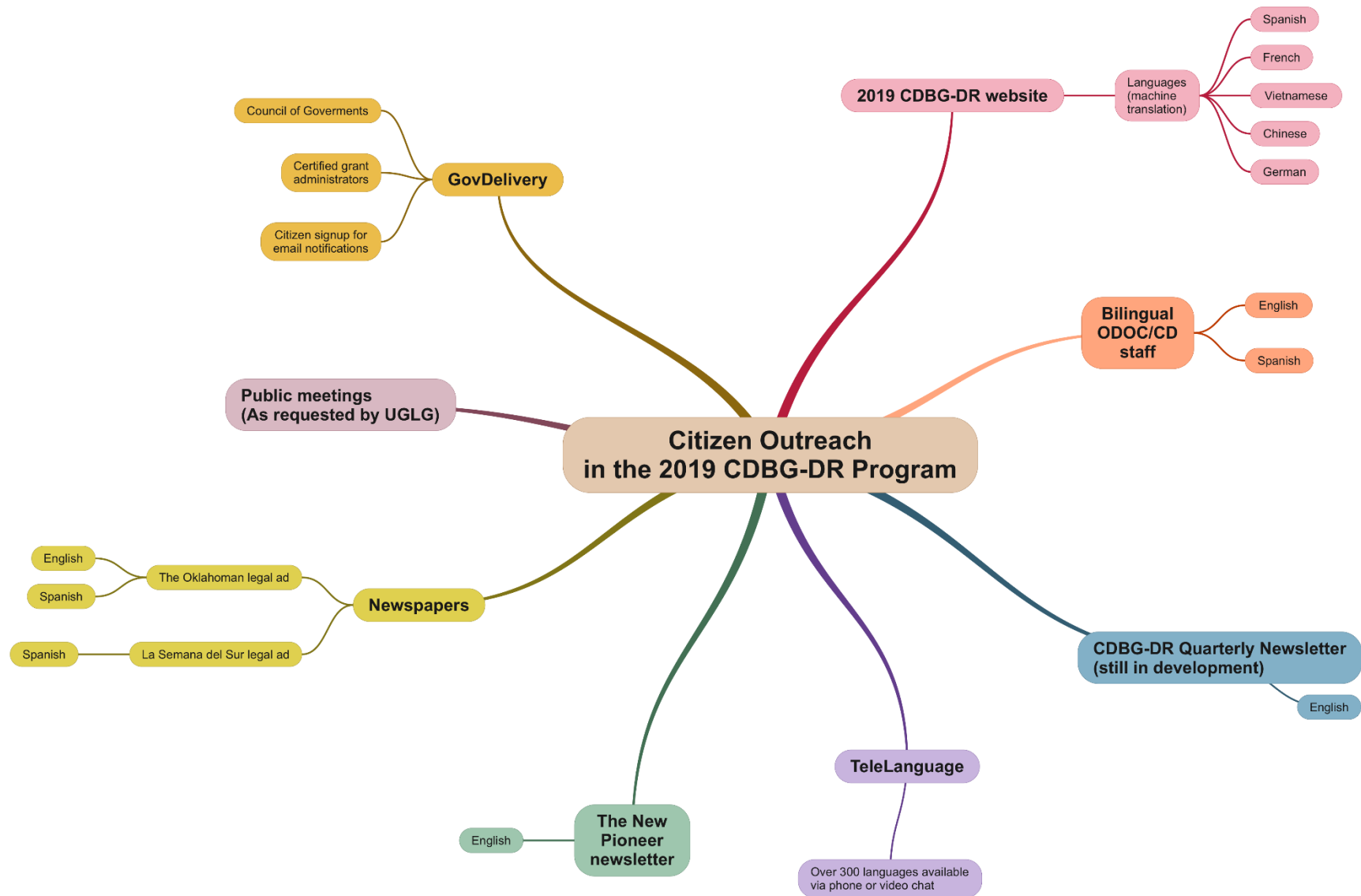
ODOC/CD reached out to 37 Public Housing Authorities spread throughout the 27 eligible counties under DR-4438 via phone and e-mail to determine the following questions:

- 1) Are there any unmet *housing* needs in the Tribal Nation following the disaster?
- 2) Are there any unmet *infrastructure* needs in the Tribal Nation following the disaster?

To date, no Public Housing Authority has issued a response indicating that there are unmet needs in their communities. For more information, please refer to Appendix A.

Ongoing Citizen Outreach Efforts

ODOC/CD remains committed to citizen outreach for the duration of the 2019 CDBG-DR program. The following diagram shows the different types of outreach conducted by the program:



2019 CDBG-DR Website: The State's disaster recovery webpage has been well advertised in documents, press releases, flyers, and meetings.

Bilingual ODOC/CD staff: There are two staff members who are bilingual in English and Spanish. Both Jade Shain and Jessica Izquierdo are capable of interpretation and translation.

CDBG-DR Quarterly Newsletter: This newsletter is currently in development. The intended audience is the general public. It will feature brief updates on what has happened in the program during the last quarter.

TeleLanguage: ODOC/CD uses this company for oral interpretation services. Over 300 different languages are available.

The New Pioneer Newsletter: This is a monthly newsletter that reaches over 17, 690 different people.

Newspapers: Request for Public Comment for Substantial Amendments are published in two different newspapers. In The Oklahoman newspaper, the notices are published in both English and Spanish. In La Semana del Sur newspaper, the notice is published in Spanish.

Public Meetings: CDBG-DR staff routinely attend public meetings as needed or upon request.

GovDelivery: A general purpose messaging service. This tool is currently in development. Once complete, the e-mail list will include UGLG, certified grant administrators, and the general public. CDBG-DR staff will use GovDelivery to inform recipients of substantial amendments to the Action Plan.

General Procedures for CDBG-DR Subrecipients

Technical Assistance

The State will make available technical assistance as applicable to eligible citizens, local governments, nonprofit organizations, community groups, Community Housing Development Organizations (CHDOs), and any other organization developing proposals per written request.

The State will provide the Citizen Participation Plan, substantial amendments, and the performance reports to the public, including materials in a form accessible to persons with disabilities, upon request. These documents are made available to the public electronically on the CDBG-DR website.

Requirements for Local Governments Receiving CDBG-DR Funds

Per 24 CFR §91.115(e), States are required to ensure that Units of General Local Governments and other potential subrecipients fully understand how Citizen Participation requirements will be met. Recipients of CDBG funds must comply with the Citizen Participation Plan requirements as found in 24 CFR §570.486. All applicants and recipients of grant funds shall be required to conduct all aspects of the program in an open manner with access to records on the proposed and actual use of funds for all interested persons. All records of applications and grants must be kept at the recipient's offices and be available during normal business hours. Any activity of the Grantee regarding the CDBG-DR project, with the exception of confidential matters relating to housing and economic development programs, shall be open to examination by all citizens.

Citizens shall be provided adequate and timely information, so as to enable them to be meaningfully involved in important decisions at the various stages of the program, including at least (A.) the determination of needs, (B.) the review of the proposed activities, and (C.) the review of past program performance, in the following manner:

1. At least two public hearings shall be scheduled at times and locations felt to be most likely to make it possible for the majority of interested persons to attend without undue inconvenience, addressing the three

items above. At least one hearing must be held to address items (A) and (B) above prior to the submission of the application for housing and/or non-housing needs. Item (C) must be addressed in a public hearing to review performance of the recipient in a previous program and must occur prior to closeout of any loan or grant for which performance evaluation has not occurred in a previous hearing. Information to include a public hearing for Item (C) shall include past performance, milestones, and lessons learned.

2. Notification of any and all hearings shall be given a minimum of fifteen (15) calendar days, not to include the actual day of the Public Hearing, in advance to allow citizens the opportunity to schedule their attendance. Notifications can be made in the form of notices placed in the local newspaper with the greatest distribution or may be conducted by posting notices where most practical for general public viewing. If notifications are posted, they must be posted in a minimum of three (3) public places. Additionally, notices may be posted via the internet by the participating Unit of General Local Government or other subrecipient provided the website is available for public access. All hearings must be accessible to handicapped persons. Provisions for interpretation shall be made at all public hearings for non-English speaking residents if such residents are expected to be in attendance.

The chief elected official's office shall receive and relate to appropriate persons or groups any views or proposals submitted to aforesaid office within the following decision-making time. Any comment submitted in writing at any time should be answered in writing within fifteen (15) working days by the chief elected official's office. If the comment is not resolved, it shall be referred to the governing body for final disposition. Comments are retained for the duration of the 2019 CDBG-DR program.

Access to Public Records

24 CFR §91.115(g) Citizens, public agencies and other interested parties will be provided access to information and records relating to Citizen Participation Plan and CDBG-DR Action Plan, in addition to any other uses of assistance under the programs covered in the plans. In accordance with 24 CFR §570.490, the public will be provided reasonable access to housing assistance records, subject to state and local laws regarding privacy and obligations of confidentiality. The State is subject to the Oklahoma Open Records Act (51 O.S. § 24A). A formal Open Records Request for inquiries relating to public

record access will be required in accordance with the Oklahoma Open Records Act (51 O.S. § 24A).

24 CFR §570.490 Recordkeeping requirements:

- (a) The State shall establish and maintain such records as may be necessary to facilitate review and audit by HUD of the State's administration of CDBG funds under §570.493. The content of records maintained by the State shall be as jointly agreed upon by HUD and the States and sufficient to enable HUD to make the determinations described at §570.493. For fair housing and equal opportunity purposes, and as applicable, such records shall include documentation related to the State's AFH, as described in 24 CFR part 5, subpart A (§5.168). The records shall also permit an audit of the States in accordance with 2 CFR 200, subpart F.
- (b) State Records: The state shall keep records to document its funding decisions reached under the method of distribution described in 24 CFR 91.320(j)(1), including all the criteria used to select applications from local governments for funding and the relative importance of the criteria (if applicable), regardless of the organizational level at which final funding decisions are made, so that they can be reviewed by HUD, the Inspector General, the Government Accountability Office, and citizens pursuant to the requirements of §570.490(c). To request records, please contact Jade Shain at the Oklahoma Department of Commerce by sending an e-mail to jade.shain@okcommerce.gov.
- (c) Disaster Recovery Grant Reporting (DRGR): The state shall make entries into DRGR in a form prescribed by HUD to accurately capture the state's accomplishment and funding data, including program income, for each program year. DRGR data will be entered on a quarterly basis. 83 FR 5853 requires each grantee to submit a QPR no later than 30 days following the end of each calendar quarter until all funds have been expended and all accomplishments have been reported.
- (d) Unit of general local government's record: The State shall establish recordkeeping requirements for units of general local government receiving CDBG funds that are sufficient to facilitate reviews and audits of such units of general local government under §570.492 and §570.493. For fair housing and equal opportunity purposes, and as applicable, such records shall include documentation related to the State's AFH as described in 24 CFR part 5, subpart A (§5.168).

- (e) Access to records: (1) Representatives of HUD, the Inspector General, and the General Accounting Office shall have access to all books, accounts, records, reports, files, and other papers, or property pertaining to the administration, receipt, and use of CDBG funds and necessary to facilitate such reviews and audits.
- (f) (The State shall provide citizens with reasonable access to records regarding the past use of CDBG funds and ensure that units of general local government provide citizens with reasonable access to records regarding the past use of CDBG funds consistent with State or local requirements concerning the privacy of personal records.
- (g) Record retention. Records of the State and units of general local government, including supporting documentation, shall be retained for the greater of three years from closeout of the grant to the state, or the period required by other applicable laws and regulations as described in §570.487 and §570.488.

Application Status Updates

All grantees will have adequate access to and communication on updates to the status of their applications at all phases. Grantees can access their application updates via grants.ok.gov. Changes to their application statuses will notify grantees by sending an automatic email through the email they created an account with on grants.ok.gov. ODOC/CD staff will make consistent contact with grantees to ensure they understand and are aware of status updates to their applications. ODOC will ensure that any questions or concerns grantees have regarding their application status or updates to their application status will be communicated via OKGrants or by email.

Citizen Complaints

The State will accept written citizen complaints from citizens related to the disaster recovery programs, Action Plans, Substantial Amendments, or quarterly performance reports. The State will provide a timely written response to each complaint. Written complaints should be submitted via email marshall.vogts@okcommerce.gov or be mailed to:

Oklahoma Department of Commerce Attn: Marshall Vogts, Director, Community Development / Community Infrastructure 900 N. Stiles Ave.
--

Oklahoma City, OK 73104

The State will make every effort to provide a timely written response to every citizen complaint within fifteen working days of the receipt of the complaint, where practical.

The State encourages all Fair Housing / Equal Opportunity complaints be filed as applicable with the Metropolitan Fair Housing Council of Oklahoma, Inc. for Fair Housing Administration. All citizen complaints relative to Fair Housing / Equal Opportunity violations involving discrimination will be forwarded to the following address for disposition:

Metropolitan Fair Housing Council of Oklahoma, Inc.
1500 Northeast 4th Street, Suite 204
Oklahoma City, OK 73117

Additionally, the State encourages all Fair Housing / Equal Opportunity complaints be filed as applicable with the State Human Rights Commission now operating under the State Office of the Attorney General.

Oklahoma Office of the Attorney General
313 NE 21st Street
Oklahoma City, OK 73105

If citizens have any information about fraud or waste, please contact the HUD OIG:

HUD OIG Hotline number: 1-800-347-3735

Appendix

Additional Documentation of Consultation Efforts

ODOC/CD conducted two significant outreach efforts to craft the CDBG-DR Action Plan. Phase II outreach began on October 8, 2020 – March 5, 2021. In this second phase, ODOC reached out to counties, cities, tribal nations, Public Housing Authorities, non-profit organizations, and state agencies for additional data. This section of the CPP details Phase II efforts conducted by ODCO/CD to meet the objective of strengthening the State's Action Plan.

The format of Survey II is detailed below. This formed the basis behind contacts by e-mail and by phone to the abovementioned entities:

My name is Jade Shain/Taylor Huizenga and I'm the Programs Planner/Programs Representative for the CDBG-DR grant program with the Oklahoma Department of Commerce. Please forward this e-mail to the person(s) most capable of responding.

The State's 2019 CDBG-DR Action Plan has been approved by HUD with conditions. One of those conditions is that we improve upon the unmet needs assessment in that plan. It's for this reason we're reaching out to you in order to obtain new data for the Action Plan. For more details on our Action Plan, please refer to our website here: <https://www.okcommerce.gov/reporting-compliance/cdbg-disaster-recovery-2019/>

We want to be sure that we have not missed anyone in the initial needs assessment. The primary focus for disaster recovery funds is on unmet housing needs related to the straight-line winds, tornadoes, and flooding that occurred from May 7, 2019 through June 1, 2019 in the following counties: Alfalfa, Canadian, Cherokee, Craig, Creek, Delaware, Garfield, Kay, Kingfisher, Le Flore, Logan, Mayes, Muskogee, Noble, Nowata, Okmulgee, Osage, Ottawa, Pawnee, Payne, Pottawatomie, Rogers, Sequoyah, Tulsa, Wagoner, Washington, Woods. Applications for CDBG-DR funding must tie back to the 05-07-19 through 06-01-19 reporting period and be located in one of the abovementioned eligible counties. The disaster declaration is here: <https://www.fema.gov/disaster/4438>.

My hope is that you can answer some questions about whether there are any unmet housing needs and provide any supporting data, documentation, or evidence supporting the claim. The Oklahoma Department of Commerce would be very appreciative of any information you can provide while you consider the following questions for DD-4438:

1. Are you aware of any unmet damages to multifamily housing (apartments, duplexes, triplexes, quadruplexes, townhouses, mixed-use buildings, or any other type) or rental homes/townhouses/other housing types?
2. We are also trying to see if any homeless populations or any nearly homeless families or individuals were negatively affected by this disaster and forced to relocate or bear an unnecessary burden due to the disaster.
3. Are there any non-white minority groups that were adversely affected by this disaster or suffered any long-term affects due to environmental degradation or have any unmet needs that they continue to bear unnecessarily?
4. Are there any neighborhoods or larger communities within your area that experienced issues relating to storm water drainage systems?

In addition to the questions above, we would be appreciative of more detail such as:

1. Whether the owner contacted and registered with FEMA.
2. The location of the unmet need
3. Number of units affected
4. Number of units targeted at or below 80% of area median income
5. Relocations or displacement caused by the disaster
6. Estimated costs of rehabilitation
7. Is the project located in the floodplain?

Feel free to use the list below to identify numerically any known issues in your area. Any additional information would be greatly appreciated such as type of home, income level, how individuals are currently sheltering or have moved elsewhere, number of individuals affected, etc.

Multi-family housing (any type):
Rental Housing (any type):
Homeless persons or families:
Nearly homeless persons or families:
Non-white minority groups experiencing unnecessary burdens:
Storm water drainage systems:

We are looking to fund any unmet needs that have come about from the disaster and have yet to be addressed. We want to make sure we prioritize any housing unmet needs first and then infrastructure.

Thank you for taking the time to read this email, and for any information you can provide for unmet housing needs in our community.

Sincerely,

Jade Shain/Taylor Huizenga

COUNTY AND CITY INPUT

For county and city related data, ODOC/CD directly contacted the Oklahoma Emergency Management (OEM) division. ODOC/CD received a dataset “DCM4438” for county and city level data.

TRIBAL NATION INPUT

ODOC/CD Contacted the following Tribal Nations for Action Plan input:

Tribal Nation	Response to ODOC received?		Unmet Housing Need?			Unmet Infrastructure Need?		
	Yes	No	Yes	No	No Response	Yes	No	No Response
Absentee Shawnee		X			X			X
Alabama Quassarte Tribal Town		X			X			X
Apache Tribe of Oklahoma		X			X			X
Caddo Nation		X			X			X
Cherokee Nation		X			X			X
Cheyenne and Arapaho Tribes		X			X			X
Chickasaw Nation	X			X			X	
Choctaw Nation of Oklahoma	X				X			X
Citizen Potawatomi Nation	X			X			X	
Comanche Nation		X			X			X
Delaware Nation		X			X			X
Eastern Shawnee Tribe of Oklahoma		X			X			X
Euchee (Yuchi) Tribe		X			X			X
Iowa Tribe of Oklahoma		X			X			X
Kaw Nation of Oklahoma	X			X			X	
Kialegee Tribal Town		X			X			X

Kickapoo Tribe of Oklahoma	X	X	X
Kiowa Indian Tribe of Oklahoma	X	X	X
Miami Tribe of Oklahoma	X	X	X
Modoc Tribe of Oklahoma	X	X	X
Muscogee (Creek) Nation	X	X	X
Osage Nation	X	X	X
Otoe-Missouria Tribe of Indians	X	X	X
Ottawa Tribe of Oklahoma	X	X	X
Pawnee Nation	X	X	X
Peoria Tribe	X	X	X
Ponca Tribe of Oklahoma	X	X	X
Quapaw Tribe	X	X	X
Sac and Fox Nation	X	X	X
Seminole Nation of Oklahoma	X	X	X
Seneca-Cayuga Nation	X	X	X
Shawnee Tribe	X	X	X
Thlopthlocco Tribal Town	X	X	X
Tonkawa Tribe of Oklahoma	X	X	X
United Keetoowah Band of Cherokees	X	X	X
Wichita and Affiliated Tribes	X	X	X
Wyandotte Nation	X	X	X

PUBLIC HOUSING AUTHORITIES INPUT

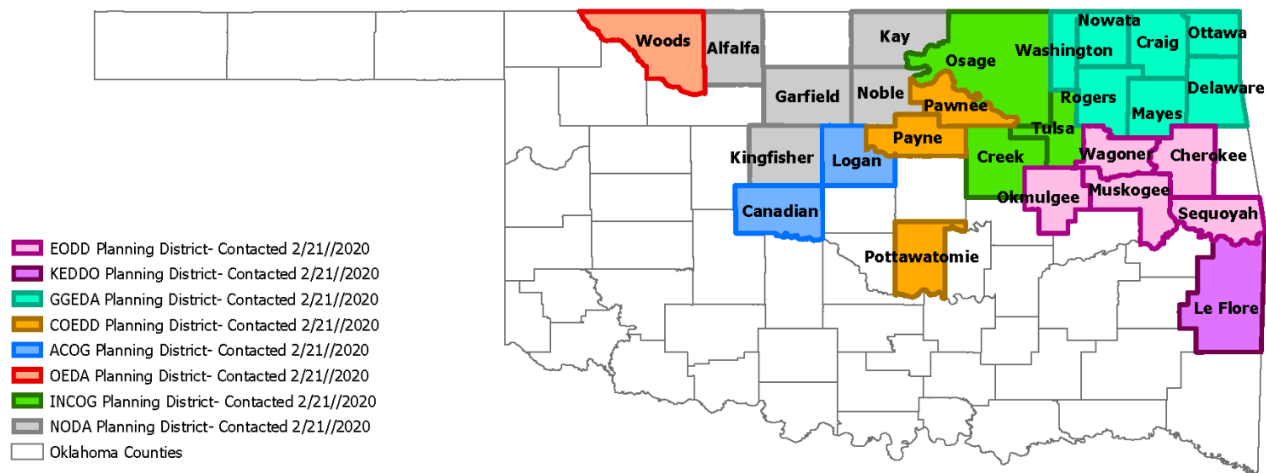
ODOC/CD contacted the following Public Housing Authorities for Action Plan input:

County	Public Housing Authority	Response to ODOC received?		Unmet Housing Need?		
		Yes	No	Yes	No	No Response
Alfalfa	No PHA located					
Canadian	No PHA located					
Cherokee	Cherokee Housing Authority		X			X
Craig	Vinita Housing Authority		X			X
Creek	Bristow Housing Authority		X			X
Creek	Drumright Housing Authority		X			X
Creek	Oilton Housing Authority		X			X
Delaware	Grove Housing Authority		X			X
Garfield	No PHA located		X			X
Kay	Newkirk Housing Authority		X			X
	Ponca City Housing Authority	X			X	
	Tonkawa Tribal Housing		X			X
Kingfisher	No PHA located		X			
Le Flore	Heavener Housing Authority		X			X
	Talihina Housing Authority		X			X
	Wister Housing Authority		X			X
Logan	Guthrie Housing Authority		X			X
Mayes	Locust Grove Housing Authority		X			X
Muskogee	Ft Gibson Housing Authority		X			X
Noble	Missouri State Housing Authority		X			X
Nowata	Nowata Housing Authority		X			X
Okmulgee	Beggs Housing Authority		X			X
	Henryetta Housing Authority		X			X
Osage	Osage County Housing Authority		X			X
Ottawa	Afton Housing Authority	X			X	
	Commerce Housing Authority		X			X
	Wyandotte Housing Authority		X			X
Pawnee	Pawnee Housing Authority	X			X	
Payne	Stillwater Housing Authority		X			X
	Yale Housing Authority		X			X
Pottawatomie	Earlsboro Housing Authority		X			X
	McCloud Housing Authority		X			X
	Shawnee Housing Authority		X			X
	Tecumseh Housing Authority	X			X	

	Wanette Housing Authority		X			X
Rogers	Catoosa Housing Authority		X			X
	Chelsea Housing Authority		X			X
	Claremore Housing Authority		X			X
Sequoyah	Sallisaw Housing Authority		X			X
Tulsa	Collinsville Housing Authority		X			X
	Tulsa Housing Authority		X			X
Wagoner	No PHA located					
Washington	No PHA located					
Woods	No PHA located					

COUNCILS OF GOVERNMENT INPUT

Substate Planning Districts (also known as Councils of Government) are interested in solving problems and planning needs that intersect multiple boundaries of local government. On February 21, 2020, emails were sent by ODOC/CD to Substate Planning Districts and eligible counties within the qualifying disaster zone requesting CDBG-DR disaster related information. The following Planning Districts were contacted on 2/21/2020 via e-mail: ACOG, COEDD, EODD, GGEDA, INCOG, KEDDO, NODA, and OEDA. The map on the following page shows which DR-4388 eligible counties fall in each Planning District.



CONTINUUM OF CARE INPUT

ODOC/CD reached out to over 20 Continuum of Care organizations on March 21, 2019, to determine whether any shelters or housing received damage. A copy of this message is copied below:

“The local HUD office has asked if there has been any reported damage to any shelters or assisted housing from yesterday’s storms. Please let us know if any shelters or housing received any damage from yesterday’s storms. Thank you for your help!”

No responses received indicated that there were any damages. The following entities were contacted (see the next page):

NUM	Shelter Name	Phone Number	Address	City	State	Zip Code
1	Ada Homeless Services	580-272-0211	317 W 12 th Street	Ada	Oklahoma	74820
2	CARD CAA	918-341-5000	707 W Lowry Road	Claremore	Oklahoma	74018
3	CDSA	580-242-6131	114 S Independence Street	Enid	Oklahoma	73701
4	City of Norman Planning and Community Development		201-A West Gray	Norman	Oklahoma	73070
5	Community Services Council of Tulsa	918-585-5551	16 E 16 th Street	Tulsa	Oklahoma	74119
6	Deep Fork CAF	918-756-2826	223 W Sixth Street	Okmulgee	Oklahoma	74447
7	Food and Shelter	405-360-4954	201 Reed Avenue	Norman	Oklahoma	73071
8	Great Plains Improvement Foundation	580-353-2364	2 SE Lee Boulevard	Lawton	Oklahoma	73502
9	Hope House Shelter	918-456-4673	1619 N Vinita Avenue	Tahlequah	Oklahoma	74464
10	INCA Community Action Agency	580-371-0277	202 S. Capitol Street, Suite 2	Tishomingo	Oklahoma	73460
11	KI BOIS CAF	918-967-3325	200 SE "A" Street	Stigler	Oklahoma	74462

12	Marie Detty YFS	580-250-1123	317 SW C Avenue	Lawton	Oklahoma	73501
13	Northeast Oklahoma CAA	918-253-4683	856 E Melton Drive, Ste C	Jay	Oklahoma	74346
14	Northern Oklahoma Youth Services	580-762-8341	2203 N Ash Street	Ponca City	Oklahoma	74601
15	Northwest Domestic Crisis Services	580-256-1215	1024 22 nd Street	Woodward	Oklahoma	73801
16	Payne County Youth Services	405-377-3380	2224 W 12 th Street	Stillwater	Oklahoma	74074
17	Safenet Services	918-341-1424	1219 W Dupont Street	Claremore	Oklahoma	74017
18	Stillwater Mission of Hope	405-332-5521	1804 S Perkins Road	Stillwater	Oklahoma	74074
19	Survivor Resource Network (DV Shelter)	580-762-2883	PO Box 85	Ponca City	Oklahoma	74602
20	Thunderbird Clubhouse	405-321-7331	1251 Triad Village Drive	Norman	Oklahoma	73071
21	Women's Resource Center	405-701-5540	222 E Eufaula Street	Norman	Oklahoma	73069
22	Youth Services of Tulsa	918-582-0061	311 S. Madison Ave	Tulsa	Oklahoma	74112

LETTERS TO RESIDENTS OF MOFFETT, OKLAHOMA

The following letter was sent to 83 residents of Moffett, Oklahoma on February 3, 2021:

Dear Resident of Moffett, Oklahoma:

Our job at the Oklahoma Department of Commerce is to help residents of Moffett obtain disaster recovery funding for the flood that happened in 2019. Working closely with us on this effort is MaryLynn Lufkin with Catholic Charities. We have heard concerns that residents of Moffett feel as though they have been forgotten. **Please note we want to help residents recover from this disaster, but we need your help to move forward in the process.**

The U.S. Department of Housing and Urban Development (HUD) can offer financial assistance to residents through the Community Development Block Grant Disaster Recovery (CDBG-DR) grant program for residents of Moffett whose homes were damaged or destroyed. The Oklahoma Department of Commerce administers the grant program.

We're writing you today because we need your help. We would like to hear from you about what you would like to see happen in Moffett. Was

your home damaged or destroyed from the flood? Do you want to stay in Moffett, or do you want to relocate elsewhere?

FINANCIAL ASSISTANCE MAY BE AVAILABLE

We're also writing to inform you about the financial assistance that may be available through the CDBG-DR program. There are two options available to residents of Moffett:

OPTION 1: For residents that want to continue to live in Moffett

Moffett will certainly flood again in the future. Financial assistance may be available to elevate homes above the Base Flood Elevation (BFE). *The money for this option is limited and may not fully cover the cost of elevation.* The cost of elevation substantially increases the lower the home is below the Base Flood Elevation.

OPTION 2: For residents that want to relocate

Residents whose homes were damaged or destroyed can be **voluntarily** bought out through the grant program. The Department of Commerce is **NOT** invoking imminent domain (the forced sale of home and lot). If residents choose the voluntary buyout, the land will be turned

into a permanent greenspace and the rebuilding of dwelling structures is prohibited by federal law.

**We would like to hear from you by March 1, 2021.
Your urgent response is greatly appreciated. Please give us a call or send us an e-mail.**

NEXT STEPS

As mentioned above, we need to hear from residents of Moffett by March 1, 2021. Please review the Financial Assistance section of this letter and contact ODOC Staff using the contact information on the last page of this letter. **The Oklahoma Department of Commerce and our partners would like to meet with residents at Moffett Public School – 701 Belt Street Moffett, OK 74946.** The meeting date and time has not yet been scheduled. Our hope is that we can coordinate with residents of Moffett to determine the best day and time to meet in person. In order for this to happen, we need residents to contact us.

QUESTIONS?

We're here to help residents of Moffett. Please contact us if you have any questions about this letter, or to discuss whether Option 1 or Option 2 is best for you and your family.

Jade Shain Programs Planner	Taylor Huizenga Programs Representative
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Community Development (CDBG-DR) Oklahoma Department of Commerce jade.shain@okcommerce.gov p. 405-250-1844 OKcommerce.gov  OKLAHOMA	Community Development (CDBG-DR) Oklahoma Department of Commerce taylor.huizenga@okcommerce.gov p. 405-308-6691 OKcommerce.gov  OKLAHOMA
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Sincerely,

Jade Shain
Taylor Huizenga

As of March 4, 2021, ODOC has received 8 responses from residents regarding the letter. ODOC met with residents in Moffett on March 31, 2021.

FEMA-STATE AGREEMENT (FSA) FOR FEMA-IA

On February 8, 2021, ODOC received Amendment Number Ten FEMA-State Agreement (FSA) for FEMA Individual Assistance (IA) data. This Amendment added to the list of State officials or employees that are authorized to request disaster survivor information.

INFORMATION SHARING ACCESS AGREEMENT (ISAA) FOR NFIP REPETITIVE LOSS

On February 19, 2021, ODOC received an ISAA from the Department of Homeland Security (DHS) and Federal Emergency Management Agency (FEMA) for data related to National Flood Insurance Program (NFIP) repetitive losses. This data will be used by ODOC to analyze which properties in DR-4438 eligible counties have experienced repetitive flood losses, leverage additional financial resources that may be available for a voluntary buyout program, and strengthen the State's 2019 CDBG-DR Action Plan.

OEM AND ODOC MEETINGS WITH EMERGENCY MANAGERS

Beginning on October 8, 2021, The Oklahoma Department of Emergency Management and Homeland Security (ODEMHS) and Oklahoma Department of Commerce (ODOC) held meetings with Emergency Managers to inform

them about the Housing Rehabilitation Program. The complete timeline of these meetings is described below:

- Friday October 8 @9:15A—Briefing in Person with the NE Emergency Managers at the NE Area Workshop. Q&A with Emergency Managers
- Wednesday October 13 @2:00P—Virtual Q&A with Emergency Managers who cannot attend the NE Area Workshop.
- Wednesday October 20 @2:00P—Virtual Kickoff Meeting with Emergency Managers, local/tribal housing partners, appropriate city/county officials, nonprofit stakeholders
- Wednesday October 27—Virtual Townhall for citizen feedback hosted by ODOC
- October-November—One on one feedback and discussion with local and tribal jurisdictions as requested

PROOF OF PUBLICATION

This section of the Plan shows proof of publication for Notices of Public Hearing.

Change History of this Document

This section of the document details the changes over time.

Version	Date	Description
1		Approval by HUD.
2	10-13-21	Changed public hearing notice period from fifteen (15) days to seven (7) days; removed numbering in Heading 2 to make it easier for the public to read; changed heading color from bolded black to bolded blue to make it easier for the public to read; clarified that Notifications of Public Hearings will be published in Spanish <u>and</u> English in the Oklahoman Newspaper; added a new event under Citizen Participation Timeline; and added a new subheading entitled “OEM and ODOC Meetings with Emergency Managers”.
3	10-19-21	Changed Notification period back to 15 for the lifetime of this Disaster Recovery program.
4	11-04-21	Created a new section titled “Audience for this Citizen Participation Plan” under the Introduction

		<p>to provide further clarification about the intended audience of this document.</p> <p>In the section “Requirements for Local Governments Receiving CDBG-DR Funds” changed the Notification window from a minimum of seven (7) working days to a minimum of fifteen (15) calendar days, not including the day of the Public Hearing.</p> <p>Created a new section titled “Proof of Publication” under the Appendix to document ODOC’s efforts in properly notifying the Public about Public Hearings.</p>
5	12-28-21	<p>Significant changes were made to this document per the requirements of the Oklahoma Department of Commerce’s Style Guide. For example, Headings and Subheadings are now using Arial instead of Times New Roman. The typeface used in the body text is now Google’s Montserrat instead of Times New Roman. All colors in the Headings and Subheadings were chosen from the Style Guide. The following Colors are used in this document.</p> <ol style="list-style-type: none"> Heading 1 = HEX #464646 Heading 2 = HEX #0066A6 Heading 3 = HEX #000000 Body/Normal = HEX #000000
6	1-21-22	<p>Added clarification to the document that Public Hearings are NOT required when the State proposes a Substantial Amendment to the 2019 CDBG-DR Action Plan.</p> <p>Added a new section to the CPP entitled “Substantial Amendments to the State’s Action Plan: Requirements for ODOC/CD”.</p>
7	04-21-22	<ol style="list-style-type: none"> 1. Removed the Four Factor Analysis from the Citizen Participation Plan. <i>This analysis is now found in the 2019 CDBG-DR Language Access Plan on the State’s 2019 CDBG-DR main webpage.</i> 2. Removed the section “Public Hearing Requirements for ODOC/CD” since there is no requirement for ODOC/CD to conduct Public Hearings for Substantial Amendments to the State’s 2019 CDBG-DR Action Plan.

		<p>3. Under “Notification of Public Hearing”, added the following language: <i>Public Hearings are not required for Substantial Amendments to the 2019 CDBG-DR Action Plan. If ODOC/CD chooses to conduct a Public Hearing, this section details the Notification Procedures that the State will perform.</i></p> <p>4. Added new content under the Participation Timeline to reflect Substantial Amendment #2.</p> <p>5. Removed social media as a location where ODOC/CD posts to inform the public about Requests for Public Comment. Updated posting locations for Substantial Amendments.</p> <p>6. Added a new section titled “Ongoing Citizen Outreach Efforts”.</p>
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